

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. 22-1730 (JRT/JFD)

Apex Brands, Inc.; Apex Tool Group, LLC,

Plaintiffs,

v.

Jinhua Haoda Technology Co., Ltd.,

Defendant.

**SECOND STIPULATION
TO EXTEND TIME TO ANSWER**

PLEASE TAKE NOTICE that the parties to this proceeding continue to be actively engaged in settlement negotiations to resolve this matter without additional court intervention.

In furtherance of those settlement negotiations, the parties have engaged in numerous exchanges of information regarding the manufacture and sales of the accused products and apparent related third-party activities. As a slight impediment to the continued negotiations, at the end of November, lead counsel for Defendant – Michael DiNardo – was out of the office for a brief time dealing with the untimely passing of his mother. In addition, Mr. DiNardo also recently recovered from a Covid infection that kept him out of the office for more than a week.

The parties are desirous of continuing their negotiations and request additional time for those negotiations without additional court intervention. To that end, and to facilitate continued settlement negotiations between the parties, preserving the resources of the parties and promoting judicial efficiency, Plaintiffs Apex Brands, Inc. and Apex Tool Group, LLC and Defendant Jinhua Haoda Technology Co., Ltd., through their authorized attorneys, hereby stipulate and agree to allow Defendant a further extension to January 20,

2023, and respectfully request that the Court grant this extension pursuant to Fed. R. Civ. P.

6(b). Defendants' answer shall be served and filed no later than January 20, 2023.

The parties submit that the foregoing stipulation establishes good cause for the granting of this extension

So stipulated this 21st day of December, 2022.

s/Nathan D. Louwagie

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